



GREAT LAKES/ATLANTIC REGIONAL OFFICE

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August 26, 2005

Mr. Don Hultman, Refuge Manager  
Upper Mississippi River National Wildlife and Fish Refuge  
U.S. Fish & Wildlife Service  
Attention: CCP Comment  
51 East 4th Street, Room 101  
Winona, MN 55987

Dear Mr. Hultman:

Thank you for the opportunity to review and provide comments on the Upper Mississippi River National Wildlife & Fish Refuge Draft Environmental Impact Statement & Comprehensive Conservation Plan. Since 1937, Ducks Unlimited, Inc. (DU) has been dedicated to conserving, restoring, and managing wetlands and associated habitats for the benefit of North America's waterfowl, other wildlife and people. The Upper Mississippi River and its major tributaries provide a major migration corridor for hundreds of thousands of waterfowl. The floodplains associated with these rivers provide a wide diversity of riparian habitats that benefit waterfowl and many other species of fish and wildlife. Because of its importance to waterfowl, the Upper Mississippi River is a priority area for Ducks Unlimited.

Ducks Unlimited reviewed the plan with a particular focus on actions that would affect the quality of the waterfowl habitat on the refuge. In general, we support activities described in the alternatives that focus on improving wildlife habitat. This includes the continued and expanded use of summer drawdowns as a tool to improve conditions for the growth of aquatic vegetation for waterfowl and other wetland dependent wildlife, as well as the use of controlled burns and other tools to maintain and enhance grassland habitat for the benefit of waterfowl and other grassland wildlife. We also support the increased emphasis on the control of invasive species using water level management, fire, biological controls, and approved herbicides to control invasive plants.

Ducks Unlimited supports continued and expanded efforts to restore and enhance wetland, upland and riparian habitat on public and private lands to benefit wildlife and improve water quality. Therefore, we support the continued and expanded use of fee title acquisition from willing sellers and voluntary conservation easements to protect existing wetland, upland and riparian habitat on the refuge and adjoining private lands.

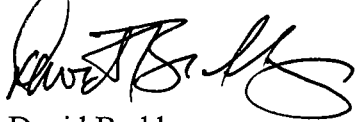
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We understand there has been a lot of controversy surrounding proposed changes to hunting on the refuge. Ducks Unlimited supports the sustainable use and harvest of renewable resources based on sound science. We support waterfowl hunting, when conducted in an ethical and sustainable manner, as a legitimate and acceptable use of a renewable resource and a compatible use of National Wildlife Refuges. Federal public lands are an important destination for American hunters with nearly half of all hunters conducting a portion of their hunting activity on these lands. We support continuation of hunting on the refuge.

Ducks Unlimited recognizes that waterfowl require many different habitat types during their life cycle, including undisturbed rest areas. We commend the Service for undertaking this strategic planning process to ensure all of these habitat types are in sufficient quantity and location to support healthy and sustainable waterfowl populations and compatible public use.

We appreciate the opportunity to provide comments on this important document.

Sincerely,



David Brakhage  
Director of Conservation Programs

Cc: Tim Morgan  
Art Lippolt  
Lon Knoedler  
Ryan Heiniger  
John Coluccy  
Eric Schenck